

ROUNDY'S SUPERMARKETS, INC.
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**Roundy's Supermarkets, Inc. Comments on Wisconsin Department of Natural Resources
NR 411 Indirect Air Source Permitting Regulations**

November 10, 2006

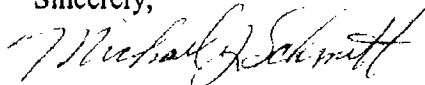
Roundy's Supermarkets, Inc. ("Roundy's") is pleased to comment on its recent experiences with the existing NR 411 program for the Wisconsin Department of Natural Resources' ("WDNR") use in revising Wisconsin Administrative Code NR 411. As of this date, Roundy's has been provided with an October 19, 2006 draft revision to NR 411.

In 2004, Roundy's obtained an indirect source construction permit for the construction of its Oconomowoc Distribution Center. The indirect source permitting process required Roundy's to satisfy NR 411 criteria, including modeling for various pollutants and the preparation of an environmental assessment. Roundy's incurred approximately \$75,000 in consulting fees associated with the indirect source permitting process – approximately \$23,000 associated with modeling and \$7,500 associated with preparing an environmental assessment.

One of the indirect air source construction permit conditions required Roundy's to limit idling to three minutes for all heavy duty diesel trucks entering, leaving or operating on the Distribution Center property, excepting when the outside temperature is less than 10 degrees Fahrenheit. Roundy's policy, however, prohibits *any* idling from *any* diesel vehicle when the temperatures are above 10 degrees Fahrenheit. If temperatures are below 10 degrees, then warm up can only occur to the extent necessary to prevent diesel fuel gelling and engine start up difficulties. Although no additional security staff is necessary to enforce this requirement, internal resources were required to develop the policy and train security staff and Roundy's internal fleet to ensure that the policy is properly implemented and enforced.

While the current Section NR 411.08(m) contained in the October 19 draft does not outline the WDNR's proposed engine idling restrictions, Roundy's understands that the WDNR intends to propose a three minute idling restriction. Roundy's costs to go beyond its permitted idling restrictions were far less than the costs and time associated with the indirect air source permitting process and, thus, Roundy's would support a three minute engine idling restriction for sources subject to the NR 411 indirect air source construction permit program.

Sincerely,



Michael J. Schmitt
Group Vice President
Roundy's Supermarkets, Inc.

